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Reply to: Theresa Noble Hill
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August 30, 2006

Via Email and Mail

Ms. D. Sharon Gentry
Riggs, Abney, Neal, Turpen, Orbison & Lewis
5801 Broadway Extension, Suite 101
Oklahoma City, OK 73118

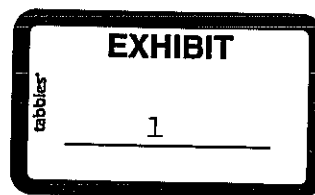
Re: *State of Oklahoma v. Tyson*
Our File No. 1790-2

Dear Ms. Gentry:

Thank you for assisting in scheduling our LCvR 37.1 conference to discuss Cargill, Inc.'s Amended First Interrogatories and Requests for Production of Documents to Plaintiffs and Cargill Turkey Production, LLC's Amended First Interrogatories and Requests for Production of Documents to Plaintiffs. We are writing to confirm our understanding of the State's position expressed at our conference today.

The only objection raised by the State at our conference to both sets of Interrogatories was to the number of Interrogatories. We understand that it is the State's position that these Interrogatories have multiple and distinct subparts which should be counted as separate Interrogatories. We understand that the State believes that if it answers some of the Interrogatories as posed it could be deemed to have waived its objection and that, therefore, the State does not intend to answer the amended interrogatories. We further understand that the State is not willing to waive this objection nor is it willing to grant Cargill an enlargement of the number of Interrogatories.

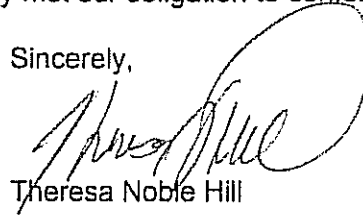
We respectfully disagree with the State's position. The majority of our Interrogatories go to the heart of the Plaintiffs' allegations. We do not believe that LCvR 33.1 requires our Interrogatories to be broken down and counted separately in the manner suggested by Plaintiffs. Moreover, even if it were determined that our amended interrogatories exceeded the number provided by the rules, we believe that these interrogatories are reasonable both in terms of substance and number given the magnitude of the case and the allegations at issue.



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If we have in any way misstated the State's position, please advise as soon as possible.
Otherwise, we will assume that we have fully met our obligation to confer under LCvR 37.1.

Sincerely,

A handwritten signature in black ink, appearing to read "Theresa Noble Hill", with a large, loopy flourish at the end.

Theresa Noble Hill

TNH:mb